

From: [Kunickis, Sheryl](#)
To: [McNally, Robert](#); [Davis, Kathy](#)
Cc: [Keaney, Kevin](#); [Jordan, William](#); [Arling, Michelle](#); [Poe, Michael](#) - OBPA; [Johansson, Robert](#) - OCE
Subject: RE: EPA's proposed changes to the agricultural Worker Protection Standard
Date: Friday, April 26, 2013 2:10:23 PM

Hi Rob,
Thanks for the quick response. See the following:

"Initial review indicates that EPA has not considered operations that derive a majority of farm income from animal operations. However, many animal operations have cropping activities integrated with their livestock operations. Initial review indicates that of the 1.1 mil livestock operations in the 2007 Census of Agriculture, approximately 376,000 report chemical purchases and 240,000 have hired labor. A closer examination will reveal a good many operations have significant cropping activities and pesticide usage. It would seem that the AWP would apply to those applications and workers as well."

Please let me know the time that works as calendars seem to fill in quickly.
Thaks,
Sheryl

From: McNally, Robert [McNally.Robert@epa.gov]
Sent: Friday, April 26, 2013 1:39 PM
To: Kunickis, Sheryl; Davis, Kathy
Cc: Keaney, Kevin; Jordan, William; Arling, Michelle; Poe, Michael - OBPA; Johansson, Robert - OCE
Subject: RE: EPA's proposed changes to the agricultural Worker Protection Standard

Sure thing, Sheryl.

So we can be prepared to answer any questions, what area is the item/issue part of?

Thanks,

Bob

From: Kunickis, Sheryl [mailto:Sheryl.Kunickis@ARS.USDA.GOV]
Sent: Friday, April 26, 2013 1:33 PM
To: Davis, Kathy
Cc: Keaney, Kevin; McNally, Robert; Jordan, William; Arling, Michelle; Poe, Michael - OBPA; Johansson, Robert - OCE
Subject: RE: EPA's proposed changes to the agricultural Worker Protection Standard

Good Afternoon,
Would you be available for a brief call (15 minutes) on Monday sometime between 1:30 and 4pm?
USDA has identified an item for discussion that we think needs to be addressed sooner than later.
Please let us know what time works for EPA.
Thanks,
Sheryl

From: Davis, Kathy [Davis.Kathy@epa.gov]
Sent: Thursday, April 25, 2013 2:03 PM

To: Poe, Michael - OBPA

Cc: Kunickis, Sheryl; Keaney, Kevin; McNally, Robert; Jordan, William; Arling, Michelle; Evans, Jeff; Kasai, Jeanne; Nelsen, Ashley; Pont, Richard; Schroeder, Carolyn

Subject: EPA's proposed changes to the agricultural Worker Protection Standard

Michael,

It was good to meet you this morning, and thank you for coordinating the briefing.

We have attached the preamble and the regulatory text (NPRM, or Notice of Proposed Rulemaking), the economic assessment (EA), and today's presentation for you to distribute within USDA. We plan to send additional materials next week, in response to the comments and questions we received today.

We would like to meet again to respond to questions or comments after you and your colleagues have reviewed the documents. To make the best use of your time, it would be best for us to have the questions or comments in advance of the next briefing. Please send all comments to me and I will collate and distribute them for responses.

Thank you!

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